

February 1, 2023

VIA ECF

The Honorable William F. Kuntz, II
United States District Court Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Plaintiffs #1-21 v. County of Suffolk, et al.*, Case No. 15-cv-2431 (E.D.N.Y.)

Dear Judge Kuntz:

We write on behalf of Plaintiffs and the County Defendants¹ (collectively, the “Parties”) in the above-referenced action to respectfully submit a request for an extension of the deadline to file the Individual Claims Settlement Agreement and Class Action Settlement Agreement (together, the “Settlement Agreements”). The deadline was originally set by your Honor in the Joint Stipulation and Scheduling Order, entered on July 29, 2022, and further extended to February 9, 2023, by orders entered by Your Honor on September 26, 2022 and December 27, 2022. *See* Dkt. Nos. 418, 421, 422.

As the Court is aware, the Parties have reached an agreement in principle and are in the process of finalizing the Settlement Agreements. Given the time and resources that have been dedicated towards reaching a final settlement, the Parties request a further extension of 20 days to the deadline to file the Settlement Agreements.

The Parties believe that there is good cause to extend the current deadline to file the Settlement Agreements, and that the requested extension will not unduly delay this case nor operate as a prejudice against any of the Parties.

In accordance with Your Honor’s Individual Rule I.C.5, the Parties state as follows:

- (1) The Parties seek an extension of the deadline to submit the Settlement Agreements. The Parties seek to extend the deadline by 20 days.

<u>Event</u>	<u>Original Deadline</u>	<u>Current Deadline</u>	<u>Proposed Revised Deadline</u>
Deadline to submit the Settlement Agreements	September 27, 2022	February 9, 2023	March 1, 2023

- (2) The Parties previously made two requests for the extension of the deadline for submission of the Settlement Agreements on September 23, 2022 and December 23, 2022.

- (3) The Parties’ previous requests for the extension of the deadline for submission of the Settlement Agreements were granted by Your Honor on September 26, 2022

¹ The County Defendants are the County of Suffolk, Suffolk County Police Department, Commissioner Edward Webber, Lieutenant Milagros Soto, Supervisory John Doe Defendants, and John Doe Defendants.

and December 27, 2022.

(4) This request is being made with the consent of both Parties.

We thank the Court for its attention to this matter and are available at the Court's convenience if it has any questions regarding this request.

Respectfully submitted,

By: /s/ Jose Perez

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Respectfully submitted,

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